



**COUNTY OF LOS ANGELES
DEPARTMENT OF AUDITOR-CONTROLLER**

KENNETH HAHN HALL OF ADMINISTRATION
500 WEST TEMPLE STREET, ROOM 525
LOS ANGELES, CALIFORNIA 90012-2706
PHONE: (213) 974-8301 FAX: (213) 626-5427

ASST. AUDITOR-CONTROLLERS

WENDY L. WATANABE
ACTING AUDITOR-CONTROLLER

ROBERT A. DAVIS
JOHN NAIMO
MARIA M. OMS

November 3, 2008

TO: Supervisor Yvonne B. Burke, Chair
Supervisor Gloria Molina
Supervisor Zev Yaroslavsky
Supervisor Don Knabe
Supervisor Michael D. Antonovich

FROM: Wendy L. Watanabe 
Acting Auditor-Controller

SUBJECT: **CITY OF PASADENA – FOOTHILL WORKFORCE INVESTMENT
BOARD CONTRACT REVIEW – A COMMUNITY AND SENIOR
SERVICES WORKFORCE INVESTMENT ACT PROGRAM PROVIDER –
FISCAL YEAR 2007-08**

We have conducted a program, fiscal and administrative contract review of the City of Pasadena - Foothill Workforce Investment Board (Foothill or Agency), a Community and Senior Services (CSS) Workforce Investment Act (WIA) Program provider.

Background

CSS contracts with Foothill, a government agency to provide and operate the WIA Youth, Adult and Dislocated Worker Programs. The WIA Youth Program is a comprehensive training and employment program for in-school and out-of-school youth ages 14 to 21 years old. The WIA Adult and Dislocated Worker Programs assist individuals obtain employment, retain their jobs and increase their earnings. Foothill's office is located in the Fifth District.

Foothill was compensated on a cost reimbursement basis and had a contract for \$249,836 for Fiscal Year (FY) 2007-08.

Purpose/Methodology

The purpose of the review was to determine whether Foothill complied with its contract terms and appropriately accounted for and spent WIA funds in providing the services

outlined in their County contract. We also evaluated the adequacy of the Agency's accounting records, internal controls and compliance with federal, State and County guidelines. In addition, we interviewed a number of the Agency's staff and clients.

Results of Review

Generally, Foothill maintained sufficient internal controls over its business operations and provided program services to eligible participants. In addition, Foothill's expenditures were allowable, accurately billed and supported by documentation as required. However, Foothill did not obtain at least 85% of their planned performance outcomes for the WIA Youth program as required by the County contract. In addition, Foothill did not:

- Accurately report the participants' program activities on the Job Training Automation system or complete the Individual Service Strategy plans as required by WIA guidelines for all four WIA Youth participants sampled.
- Complete the Individual Employment Plans as required by WIA guidelines for all 13 Adult and Dislocated Worker participants sampled.
- Complete their bank reconciliations timely.

Details of our review, along with recommendations for corrective action, are attached.

Review of Report

We discussed our report with Foothill and CSS on July 29, 2008. In their attached response, Foothill concurred with our findings and recommendations.

We thank Foothill for their cooperation and assistance during this review. Please call me if you have any questions or your staff may contact Don Chadwick at (626) 293-1102.

WLW:MMO:DC:EB

Attachment

c: William T Fujioka, Chief Executive Officer
Cynthia Banks, Director, Department of Community and Senior Services
Phillip L. Dunn, Executive Director, City of Pasadena – Foothill WIB
Anthony Tartaglia, Chairperson, City of Pasadena – Foothill WIB
Public Information Office
Audit Committee

**WORKFORCE INVESTMENT ACT PROGRAM
CITY OF PASADENA – FOOTHILL WORKFORCE INVESTMENT BOARD
FISCAL YEAR 2007-08**

ELIGIBILITY

Objective

Determine whether the City of Pasadena - Foothill Workforce Investment Board (Foothill or Agency) provided services to individuals that meet the eligibility requirements of the Workforce Investment Act (WIA).

Verification

We reviewed the case files for 17 (35%) of the 49 participants that received services from July 2007 through February 2008 for documentation to confirm their eligibility for WIA services.

Results

Generally, Foothill maintained appropriate documentation to support the eligibility of the 17 participants sampled.

Recommendation

There are no recommendations for this section.

BILLED SERVICES/CLIENT VERIFICATION

Objective

Determine whether the Agency provided the services in accordance with the County contract and WIA guidelines. In addition, determine whether the participants received the billed services.

Verification

We reviewed the documentation contained in the case files for the 17 (35%) participants that received services during July 2007 through February 2008. We also interviewed three youth, three adult and two dislocated worker participants.

Results

Youth Program

The three participants/guardians interviewed stated that the services they received met their expectations. However, Foothill did not always comply with WIA guidelines. Specifically, Foothill did not:

- Accurately report the youths' program activities on the Job Training Automation (JTA) system for the four youths sampled. The Agency reported that they completed Individual Employment Plans (IEP) for each of the four youths sampled. However, the IEP is a program activity restricted only to the WIA Adult, Dislocated Worker or Adult Special Needs Programs not for the Youth Program. The JTA system is used by the State of California Employment Development Department (EDD) and the Department of Labor to track WIA participants' activities.
- Complete the Individual Service Strategy (ISS) plans as required by WIA guidelines for the four youths sampled. The ISS plan is a comprehensive on-going plan jointly developed by the participant and the case manager that identifies the participant's background, skills, goals, barriers to employment and service plans needed to achieve the goals. A similar finding was also noted during the prior two years' monitoring reviews.
- Maintain appropriate documentation in one (25%) youth's case file to support the program activities reported on the JTA system. Specifically, Foothill did not maintain signed receipts to support the supportive services reported as completed on the JTA system.

Adult and Dislocated Worker Programs

The five participants interviewed stated that the services they received met their expectations. However, Foothill did not always comply with WIA guidelines. Specifically, Foothill did not:

- Complete the IEPs as required by WIA guidelines for all 13 Adult and Dislocated Worker participants sampled. Specifically, Foothill did not complete the participants' "Personal Strengths and Skills Inventory" on the participants' IEPs as required by the WIA guidelines. The IEP is an on-going plan, jointly developed by the participant and the case manager that identifies the participant's employment goals, achievement objectives and the services needed to achieve their employment goals. This finding was also noted during the prior two years' monitoring reviews.
- Follow-up with the exited participants on a quarterly basis for seven (54%) of the 13 participants sampled. Subsequent to our review, Foothill provided additional documentation to support that the quarterly follow-ups were conducted as required for five of the seven participants.

Recommendations**Foothill management:**

1. Ensure that staff accurately update the Job Training Automation system to reflect the participants' program activities.
2. Ensure that staff complete the Individual Service Strategy plans for the youth participants.
3. Ensure that staff maintain appropriate documentation in the participants' case files to support the program activities reported as completed on the Job Training Automation system.
4. Ensure that staff complete the Individual Employment Plan for the Adult and Dislocated Worker participants.
5. Ensure that staff follow-up with exited participants on a quarterly basis.

PERFORMANCE OUTCOME REVIEW**Objective**

Determine whether Foothill met the planned performance outcomes as outlined in the County contract and accurately reported the performance outcomes to the Workforce Investment Board (WIB). The performance outcomes included measuring the number of participants that enrolled in the program, exited the program, completed training and/or gained employment.

Verification

We compared the reported Fiscal Year (FY) 2007-08 actual performance outcomes to the planned performance outcomes outlined in the County contract and to the program activities reported on the JTA system.

Results

Foothill met all the planned performance outcomes outlined in the County contract for the WIA Adult and Dislocated Worker Programs. However, Foothill did not obtain at least 85% of their planned performance outcomes for the WIA Youth Program as required by the County contract. Specifically, Foothill exited 67% of the planned exits and placed 67% of the planned placements.

Recommendation

- 6. Foothill management ensure that planned performance outcomes are met as required by the County contract.**

CASH/REVENUE

Objective

Determine whether cash receipts and revenue are properly recorded in the Agency's records and deposited timely in their bank account. In addition, determine whether there are adequate controls over cash, petty cash and other liquid assets.

Verification

We interviewed Agency personnel and reviewed financial records. We also reviewed the Agency's November 2007 bank reconciliation.

Results

Foothill maintained adequate controls to ensure that revenue was properly recorded and deposited in a timely manner. However, Foothill did not always complete their bank reconciliations within 30 days of the bank statement date as required by the County contract. Specifically, as of the March 2008, the most recent bank reconciliation completed was for November 2007. A similar finding was also noted during the prior year's monitoring review.

Recommendation

- 7. Foothill management ensure that the bank reconciliations are completed within 30 days of the bank statement date.**

EXPENDITURES/PROCUREMENT

Objective

Determine whether program related expenditures are allowable under the County contract, properly documented and accurately billed.

Verification

We interviewed Agency personnel, reviewed financial records and reviewed documentation to support 22 non-payroll expenditure transactions billed by the Agency for July and September 2007, totaling \$2,015.

Results

Foothill's expenditures were allowable, accurately billed and supported by documentation as required.

Recommendation

There are no recommendations for this section.

ADMINISTRATIVE CONTROLS/CONTRACT COMPLIANCE**Objective**

Determine whether the Agency maintained sufficient internal controls over its business operations. In addition, determine whether the Agency is in compliance with other program and administrative requirements.

Verification

We interviewed Agency personnel, reviewed their policies and procedures manuals, conducted an on-site visit and tested transactions in various areas such as expenditures, payroll and personnel.

Results

Foothill maintained sufficient internal controls over its business operations and complied with other program and administrative requirements.

Recommendation

There are no recommendations for this section.

FIXED ASSETS AND EQUIPMENT**Objective**

Determine whether Foothill's fixed assets and equipment purchases made with WIA funds are used for the WIA programs and are safeguarded.

Verification

We interviewed Agency personnel and reviewed the Agency's fixed assets and equipment inventory listing. In addition, we performed an inventory and reviewed the usage of all three items purchased with WIA funds, totaling \$1,677.

Results

Foothill used the items purchased with WIA funding for the WIA program. In addition, the items were adequately safeguarded.

Recommendation

There are no recommendations for this section.

PAYROLL AND PERSONNEL**Objective**

Determine whether payroll expenditures were appropriately charged to the WIA programs. In addition, determine whether personnel files are maintained as required.

Verification

We traced the payroll expenditures invoiced for seven employees and four participants totaling \$10,648 for July and September 2007 to the Agency's payroll records and time reports. We also interviewed one staff and reviewed the personnel files for five employees assigned to the WIA programs.

Results

Generally, Foothill maintained the employees' personnel files as required. However, Foothill did not maintain adequate documentation to support the payroll expenditures. Specifically, the employees' September 2007 timecards for four (57%) of the seven employees sampled were not signed by the employees or the supervisors as required.

Subsequent to our review, Foothill provided signed timecards for the four employees.

Recommendation

8. Foothill management ensure that payroll expenditures are adequately supported by signed and approved timecards.

COST ALLOCATION PLAN**Objective**

Determine whether Foothill's Cost Allocation Plan was prepared in compliance with the County contract and the Agency used the Plan to appropriately allocate shared program expenditures.

Verification

We reviewed the Cost Allocation Plan and reviewed a sample of expenditures incurred by the Agency in July and September 2007 to ensure that the expenditures were properly allocated to the Agency's programs.

Results

Foothill's Cost Allocation Plan was prepared in compliance with the County contract and costs were appropriately allocated.

Recommendation

There are no recommendations for this section.

CLOSE-OUT REVIEW**Objective**

Determine whether the Agency's FY 2006-07 final close-out invoices for the WIA Youth, Adult and Dislocated Worker Programs reconciled to the Agency's financial accounting records.

Verification

We traced Foothill's FY 2006-07 general ledgers to the Agency's final close-out invoices for FY 2006-07. We also reviewed a sample of expenditures incurred from April to June 2007, totaling \$22,182.

Results

Foothill's final close-out invoices reconciled to the Agency's financial records.

Recommendation

There are no recommendations for this section.

PRIOR YEAR FOLLOW-UP**Objective**

Determine the status of the recommendations reported in the prior monitoring review completed by the Auditor-Controller.

Verification

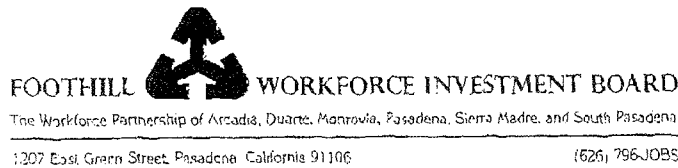
We verified whether the outstanding recommendations from FY 2006-07 monitoring review were implemented. The report was issued on December 7, 2007.

Results

The prior year's monitoring report contained four recommendations. As previously indicated, the findings related to recommendations 2, 4 and 7 contained in this report were also noted during the prior year's monitoring review. The remaining recommendation required the Agency to implement the outstanding recommendations addressed in the FY 2005-06 monitoring report. Foothill management indicated that they will implement all recommendations by December 31, 2008.

Recommendation

9. Foothill management implement the outstanding recommendations.



WORKFORCE INVESTMENT BOARD

Chair:
Anthony P. Tartaglia
The Gas Company

Executive Director:
Phillip L. Dunn

POLICY BOARD
Chair:
Michael Ten
City of South Pasadena

October 14, 2008

Wendy L. Watanabe, Acting Auditor-Controller
Department of Auditor-Controller
Countywide Contract Monitoring Division
1000 S. Fremont Avenue, Suite #51
Alhambra, CA 91803
Attention: Yoon Bae

Re: REVISED RESPONSE TO MONITORING REPORT

This letter will respond to the draft monitoring report of the Foothill WIB's WIA programs with the County. We will provide a response to the report's recommendations.

Recommendations 1-5 relative to Billed Services/Client Verification

The Foothill WIB has revised its written Case Management Policy to address the Recommendations contained in this section relative to:

- *Updating the ITA system*
- *Completion of IEP and ISS documents*
- *Adequate documentation to support participant activities*
- *Participant follow-up by staff*

See attached Case Management Policy statement. The revised policy will be monitored by the Operations Manager or her designee.

Recommendation 6 relative to Participant Outcome Review

The primary reason for our underperformance on youth exits and youth placements is that our enrollment activities took place later in the year than originally planned. For the current year, we will ensure that enrollments occur early enough in the program year for the participants to complete their planned activities and achieve a successful outcome. We will monitor enrollment, exits, and placements on a monthly basis.

Recommendation 7 relative to bank reconciliations not completed within 30 days of the bank statement date

The City of Pasadena's Treasury Department prepares the City General Account Bank Reconciliation within an average of 45 days of receipt, since all bank statements are not received until the 10th to 15th business day after the end of the month. The General Account has multiple transactions that are processed through this account and are verified on a daily basis during our daily cash flow analysis. The WIA funds received from the County are wired into the City bank account and are verified when received on a daily basis. The City Treasury Department does a daily reconciliation of funds received and are then given to Accounts Receivable to record on the date it was received. Prior to preparing the Bank Reconciliation, the WIA funds have been verified as being received and recorded to our accounting system.

If necessary, the City will request a waiver of the County's 30-day policy.

Recommendation 8 relative to Payroll and Personnel

The monitoring report indicates that some employee time cards were not signed by the employees or the supervisors. In fact, hard copies and electronic copies of timecards for the specific employees and period were signed by the employees and supervisors. This documentation was provided to County staff at the exit conference. Thus, there should be no finding.

Recommendation 9 relative to Prior Year Follow-Up.

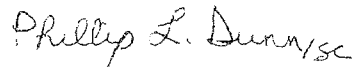
The outstanding issues from the previous report are the same as those in Recommendations 2, 4 and 7 above and are addressed in this letter.

We believe that our responses satisfactorily address the findings contained in your draft report.

We would like to thank your staff for the professional manner in which they conducted their review.

If you have any questions, please call Steve Chase at 626-584-8394.

Sincerely,



Phillip L. Dunn
Executive Director

PLD:SLC

City of Pasadena
Career Services Division/ Foothill Workforce Investment Board
POLICY/ PROCEDURE STATEMENT

DATE: May 22, 2008

Number: DRC 042408/CMG

SUBJECT: Case Management
Policies and Procedures Guide

Purpose: To provide the policies and procedures for case management services for programs funded by the Foothill Workforce Investment Board (FWIB).

Case management is a coordinating and therapeutic function for working with those in need of particular kinds of human services. The essential elements of case management are client intake, assessment of need, service planning, service coordination and linking, and the monitoring and continuous evaluation of the client, of service delivery, and of available resources. Client advocacy are considered integral to the case management process. Client advocacy denotes speaking on behalf of and working for a client's benefit to ensure that quality services are provided and goals are achieved. The goal of case management in human services is to resolve the client's problems in the most effective way possible within the constraints of the service program. Therefore, to be an effective case manager, it is important to practice efficient and effective case management activities.

When Does Case Management Begin

Case Management is the provision of a participant centered approach in the delivery of services designed to prepare and coordinate comprehensive employment plans. *Case Management services begin once the participant is formally enrolled in a program funded by the FWIB.*

Case Manager Duties and Responsibilities

Under general supervision, Case Managers will provide case management services to clients enrolled in a Foothill funded program. Case management consists of the following duties and responsibilities:

- Review client intake/eligibility determination;
- To conduct a needs assessment with the client to identify skills, aptitudes, interests, barriers to employment, enrollment risk factors and support services needs;
- To determine if a comprehensive skill assessment is required and to select the appropriate assessment tools;
- Development of client Individual Employment Plan (IEP) or individual Service Strategy (ISS), a tool used to identify and document employment goals based on interests, work values, aptitudes abilities and local labor market demand, appropriate achievement objectives and strategies based upon specific timelines and appropriate combination of services for the participant to achieve employment goals;

- To provide individual and group career counseling and exploration designed to enable clients to achieve personal and economic self-sufficiency, to assist clients with the identification of barriers to employment and the strategies for overcoming those barriers;
- To provide community resource referrals to appropriate agencies/organizations;
- To provide follow-up services to update the clients progress regarding the implementation of their IEP or ISS specifically outlining employment goals, steps to reach employment and wage goals, skill development and job search activities;
- Maintain knowledge of private and public educational/training institutions;
- Determine appropriateness for specific programs and issue individual Training Vouchers when necessary;
- Issue support services and maintain required documentation for compliance review;
- Deliver job seeking skills enhancement workshops and group sessions;
- Maintain knowledge of local labor market, employer needs and industry hiring trends;
- Coordinate provision of training, education and support services with partners' organizations and other community resources;
- Assist clients with finding employment utilizing CalJOBS and other local resources;
- Maintain client files in compliance with program/funding regulations/requirements;
- Prepare MIS forms and data enter as appropriate.

Assessment and Completion of Individual Employment Plan (IEP)/Individual Service Strategy (ISS)

A comprehensive assessment should include the use of diagnostic testing and use of other assessment tools including in-depth interviewing and evaluation. A comprehensive assessment should include a review of basic skills, interests, aptitudes, previous work experience or vocational training, employment barriers, supportive services and employment-related developmental needs of the client. Foothill may accept the assessment results of other entities where appropriate.

The Individual Employment Plan (IEP) and Individual Service Strategy (ISS) are tools used to identify employment goals, appropriate achievement objectives, appropriate services and the steps necessary to achieve specific goals. An appropriate combination of program services necessary to reach the goals identified. The case manager is responsible for the coordination and sequencing of services so that the appropriate array of services is provided. Both the IEP and ISS must identify age appropriate career goal(s) and must consider assessment results. The IEP and ISS must include benchmarks to evaluate progress regularly.

The IEP and ISS consist of five (5) parts.

- Part 1: Participant Background
 - Part 2: Personal Strengths and Skills Inventory
 - Part 3: Track Characteristics – designed to assist them in mapping and charting out the Client's characteristics, the planned services and outcomes planned.
 - Part 4: Goals and Service Plan – to be developed in conjunction with the participants.
 - Part 5: Progress Notes – should consist of program progress notes and post-program follow-up notes.
- The IEP and ISS is the repository for all test scores, significant findings and results relevant to the participant. It is a combination of three kinds of data: data about the participant, data about the

local labor market and data on available training programs and community resources that can assist in the client meeting their goal.

The IEP and ISS must be updated at a minimum of every thirty (30) days. The IEP or ISS benchmarks are reviewed with the participant and noted on the IEP or ISS progress notes. Progress notes should include the following.

- Date of Contact
- Method of Contact
- Notation of Benchmark
- Progress of Benchmark
- Benchmark Challenges
- Support Services Needs
- Initials of Case Manager

Additional progress notes may be added to the IEP or ISS. Progress notes are different from case file notes in that progress notes are specifically used to update the participant's progress regarding the goals contained in the IEP or ISS. Case notes should be used for any other notations that apply to the participant's case or file.

Case managers are responsible for continuing to manage a participant's progress through the 30th and 60th day after exit. The FWIB Follow-Up Staff will also follow-up with participants at the 30th and 60th days after exit. The purpose of this double follow-up period is to allow for a warm hand-off to occur for the participant between the case managers and the follow-up staff. This should be explained to the participant during eligibility and program enrollment.

Participant Profile

Case managers are responsible for establishing each participant's risk factor and providing the recommended participant follow-up based on their risk factor. Following is a list of risk factors and the follow-up recommended based upon the risk factor.

Low Risk – includes established work history, no significant employment barriers, adequate financial resources, adequate housing, stable family environment, no history of drug/alcohol abuse, basic skills proficient, limited need for support services, high self-esteem and motivation.

Low risk follow-up includes monthly telephone follow-up with customer, quarterly follow-up with employer (if applicable), monitoring of performance standards status, further job development (if needed).

Moderate Risk – may have some challenges in the following areas: work history, significant employment barriers, financial resources, housing, family environment, basic skills, self-esteem and motivation. No history of drug/alcohol abuse. Limited need for support services and may require referrals to other community resources

Moderate risk follow-up includes monthly telephone follow-up and case management appointment with customer, quarterly follow-up with employer (if applicable), monitoring of performance standards status, enrollment in retention counseling and further job development (if needed).

High Risk – problems in one or more of the following areas: work history, significant employment barriers, financial resources, housing, family environment, basic skills, self-esteem and motivation. A may have history of drug/alcohol abuse. Substantial support services are needed and the participant will require referrals to other community resources.

High risk follow-up includes bi-weekly telephone follow-up with customer, possible home or employer site visits, monthly follow-up with employer (if applicable), monitoring of performance standards status, enrollment in retention or other applicable counseling, enrollment in partner program and further job development (if needed).

Extremely High Risk – significant problems in one or more of the following areas: work history, significant employment barriers, financial resources, housing, family environment, basic skills, self-esteem and motivation. A may have history of drug/alcohol abuse. Substantial support services needs. **May be better served by FETC partner agency prior to WIA enrollment.**

Follow-Up

The progress of a WIA participant who is enrolled in intensive and/or training services is monitored until the IEP or ISS is completed and FWIB staff is confident that the participant is securely attached to the labor force. At this point, the participant receives a hard exit from the program. Once an exit form is completed and data entered, MIS staff will provide participant follow-up. WIA requires that follow-up occur the 1st quarter, 2nd quarter, 3rd quarter and 4th quarter after exit. The FWIB Follow-Up Staff will also follow-up with participants at the 30th and 60th days after exit. Follow-up staff will complete the WIA/JTA follow-up forms for all follow-up time periods. The participant's file is closed after 4th quarter follow-up.

If a participant is found to be unemployed during follow-up, that participant's file is pulled and forwarded to the Foothill Quality Assurance Coordinator (QC) for follow-up. The QC will contact the participant and make arrangements to assist the participant with additional job search assistance and limited support services. Participants who have exited the program may still receive limited program services including job counseling, assistance with securing a better paying job, peer support and some support services.

For all participants who are unavailable by phone for during the follow-up period, the follow-up questions will be mailed along with a self addressed envelope so the participant can provide follow-up information via mail. The follow-up questions will also be made available via email as an alternative measure.

Placement Responsibilities

It is the case manager's responsibility to take an active role in their participant's job search activities. Placement in a job with a self-sufficient wages, benefits and an identifiable career ladder should be the final outcome for each participant. The case manager is responsible for working with the FWIB Business Services Unit to assist with the job match process. As the appropriate job leads are made available, the case manager is responsible for connecting the participant with the Business Services Unit. The case managers should also forward a copy of the participant's resume to the Business Services Unit for any participant who is in the job search phase of their IEP or ISS.

All participants in the job search phase should be referred to the Foothill Employment and Training Connection's weekly job club. Case managers may also attend the job club to follow-up on their participant's IEP or ISS progress. It is also recommended that each participant attend the following job search workshops:

- It's All About Strategy
- Internet Job Search
- Giving a Great Interview
- Building a Top Notch Resume
- CalJOBS Workshop
- Change Management Workshop

In addition, these workshops should be included in the development of the participant's IEP or ISS.

Job Training Automation (JTA) Requirements

The Job Training Automation System Workforce Investment Act Client Forms Handbook is designed to provide the Management Information System (MIS) administrators, case managers and data key entry staff, guidance to WIA client forms completion and data key entry into the JTA System.

The case manager will complete an application form to gather demographic and eligibility data when a client initially applies for the WIA program. Once the client has been determined eligible for the program and services are provided, an enrollment should be completed and entered into JTA. A client will have only

one enrollment/registration for each WIA program funding source (grant code). An enrollment/registration for WIA services will be completed. The enrollment/registration form is used to track the client's training activities and/or services received throughout program participation. If the client is an in-school youth or an appropriately assessed out-of-school youth, at least one goal per 12-month period must be set to ensure attainment of basic skills, for example reading comprehension, math computation, listening, writing, and speaking for example. The goals set will be entered into the JTA system. A maximum of three primary reportable goals per program year may be entered for performance purposes. Exit data should be provided once the client completes his or her participation in the WIA program and all other related services. This will eliminate Automatic State Exits of clients due to 150 days of inactivity. The client is no longer a client when all enrollment activities are closed, there are no open enrollments, and the client is exited. Documentation of supportive Post Exit Services, such as child/dependent care, bus passes, and job shadowing for example, is optional for adults but required for a minimum of 12-months for youth. The follow-up contact information form is required for collecting information after the client exits. This form is also used to collect diplomas/certificates attained and supplemental employment data. This follow-up process is critical to performance management. For youth, follow-up is required (Title 20 of the Code of Federal Regulations, Part 664.450 (b)) for 12-months after exit. For adults and dislocated workers, supportive services must be available, as appropriate, after entry into unsubsidized employment.

It is imperative that all staff involved in participant registration, enrollment, exit and follow-up, accurately input the necessary data and update that data to reflect the participants' program activities. In addition staff must maintain appropriate documentation in the participants' case file to support the program activities reported as completed in JTA.

Action

Implementation of this directive should begin immediately. Please bring this directive to the attention of all relevant parties

INQUIRIES:

If you have any questions, please contact the Foothill Operations Manager at (626) 584-8393.